



BellSouth Telecommunications, Inc.
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Nashville, Tennessee 37201-3300

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REC'D
Patrick Turner
Attorney

'00 APR 26 PM 1 56

April 26, 2000

VIA HAND DELIVERY

Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37245

Re: *Discount Communications, Inc.*
Docket No. 00-00230

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth Telecommunications, Inc.'s Response to the Consumer Advocate Division's Petition for Information in the above-referenced matter. A copy of the enclosed is being provided to counsel of record.

Very truly yours,

Patrick W. Turner

PWT/jem

Enclosure

CERTIFICATE OF SERVICE

I hereby certify that on April 26, 2000, a copy of the foregoing document was served on the parties of record, via the method indicated:

☒ Hand
☐ Mail
☐ Facsimile
☐ Overnight

Richard Collier, Esquire
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0500

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

Henry Walker, Esquire
Boult, Cummings, Conners & Berry
414 Union Avenue, #1600
Post Office Box 198062
Nashville, Tennessee 37219-8062

☐ Hand
☒ Mail
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☐ Overnight

Vance Broemel, Esquire
Consumer Advocate Division
426 Fifth Avenue North
Nashville, Tennessee 37243-0500



1. BellSouth objects to each Request to the extent that it purports to impose upon it any obligations more onerous or far reaching than those provided for in the Tennessee Rules of Civil Procedure or any other applicable statute, rule, or regulation.
2. BellSouth objects to each Request to the extent it would require BellSouth to reveal information or documents that are protected from disclosure by the attorney-client privilege, the work-product doctrine, or any other applicable privilege. 26.02(3).
3. BellSouth objects to each Request to the extent that it would require BellSouth to create or produce a document it does not maintain in the ordinary course of business.

BellSouth Telecommunications, Inc.
TN Docket 00-00230
CAD's Request for Information
April 4, 2000
Item No. 1
Page 1

REQUEST: Is it BellSouth's contention that the filing of either its Directory Assistance Tariff or the modification of its Lifeline tariff modifies its contract with Discount Communications?

RESPONSE: No. The resale agreement between Discount Communications and BellSouth provides that the price of a given resold service is the then-current tariffed rate for the service less the applicable wholesale discount. Neither the Directory Assistance tariff nor the Lifeline tariff modifies these contractual provisions.

REQUEST: If BellSouth contends that modification of its tariffs constitute a modification of its contracts, please explain fully how BellSouth believes:

- (a) Mutuality of assent is achieved prior to the modification?
- (b) How a meeting of the minds is achieved prior to the modification?
- (c) What is the consideration of the modification?
- (d) How was mutuality of assent given by Discount Communications?
- (e) How was a meeting of the minds achieved with Discount Communications?
- (f) What was the consideration given for modification of the contract with Discount Communications?

RESPONSE: Please refer to BellSouth's Response to Item No. 1. Additionally, Discount Communications has enjoyed the benefits of these contractual provisions. For example, as a result of a reduction in BellSouth's tariffed rate for Touch-tone, Discount Communications pays less for resold Touch-tone services today than it paid for these services at the time it signed the resale agreement.

REQUEST: For each month from January 1, 1999 through February 29, 2000 identify the number of BellSouth Telecommunications Lifeline customers provided service in Shelby County Tennessee.

RESPONSE: BellSouth objects to this request on the grounds that it does not maintain records responsive to this request in the ordinary course of its business and that the information requested is not readily available from records BellSouth does maintain in the ordinary course of business. Without waiving this objection, BellSouth responds by providing the following number of BellSouth end-user Lifeline accounts with Shelby County tax codes:

January	99	-	3009
February	99	-	3128
March	99	-	3373
April	99	-	3466
May	99	-	3587
June	99	-	3665
July	99	-	3755
August	99	-	3855
September	99	-	3919
October	99	-	3948
November	99	-	3984
December	99	-	4023
January	00	-	4001
February	00	-	4036

These are "end of the month" numbers, and they do not include Lifeline services BellSouth sells to resellers. BellSouth notes that these numbers reflect BellSouth end-user Lifeline accounts -- BellSouth has no way of knowing how many persons have access to each account. Assuming that

four members of a household have access to each account, for instance, the 4036 number for February 2000 represents more than 16,000 persons with access to BellSouth end-user Lifeline accounts with Shelby County tax codes.

REQUEST: Does BellSouth Telecommunications, Inc. terminate service to Lifeline customers for non-payment?

If yes, please state if service to Lifeline customers is terminated for nonpayment of:

- (a) interLATA long distance bills,
- (b) intraLATA long distance bills,
- (c) local service bills,
- (d) directory assistance charges, or
- (e) for other services billed on behalf of BellSouth's non-regulated operations or other providers.

RESPONSE: Please refer to the attached copy of BellSouth's Lifeline tariff (BellSouth's Tennessee General Subscriber Services Tariff A3.31), which addresses the circumstances under which service to BellSouth's end-user Lifeline customers may be terminated for non-payment.

BELLSOUTH
TELECOMMUNICATIONS, INC.
TENNESSEE

GENERAL SUBSCRIBER SERVICES TARIFF

Fourth Revised Page 75
Cancels Third Revised Page 75

ISSUED: October 8, 1999
BY: President - Tennessee
Nashville, Tennessee

EFFECTIVE: November 8, 1999

A3. BASIC LOCAL EXCHANGE SERVICE

A3.31 Lifeline

A3.31.1 Description of Service

- A. The Lifeline program is designed to increase the availability of telecommunications services to low income subscribers by providing a credit to monthly recurring local service to qualifying residential subscribers. Basic terms and conditions are in compliance with the FCC's Order on Universal Service in FCC 97-157, which adopts the Federal-State Joint Board's recommendation in CC Docket 96-45, which complies with the Telecommunications Act of 1996. Specific terms and conditions are as prescribed by the Tennessee Regulatory Authority and are as set forth in this tariff.
- B. Lifeline is supported by the federal universal service support mechanism.
- C. Federal baseline support of \$5.25 is available for each Lifeline service and is passed through to the subscriber. An additional \$3.50 credit is provided by the Company. Supplemental federal support of \$1.75, matching one half of the Company contribution, will also be passed along to the Lifeline subscriber. The total Lifeline credit available to an eligible customer in Tennessee is \$10.50. The amount of credit will not exceed the charge for local service, *which includes the access line, Touch-Tone, the Subscriber Line Charge and local usage.*

A3.31.2 Regulations

A. General

1. Customers eligible under the Lifeline program are also eligible for connection assistance under the Link-Up program.
2. One low income credit is available per household and is applicable to the primary residential connection only. The named subscriber must be a current recipient of any of the low income assistance programs identified in *B.* following.
3. A Lifeline customer may subscribe to the current capped message rate Lifeline plan (USOC LM8) or any local service offering available to other residence customers. Since the Lifeline credit is applicable to the primary residential connection only, it may not be applied to a multiple line package local service offering.
4. Toll blocking, if elected, will be provided at no charge to the Lifeline subscriber.
5. The deposit requirement is not applicable to a Lifeline customer who subscribes to toll blocking. If a Lifeline customer removes toll blocking prior to establishing an acceptable credit history, a deposit may be required. When applicable, advance payments will not exceed the connection and local service charges for one month.
6. The PICC will not be billed to Lifeline customers who subscribe to toll blocking and do not presubscribe to a long distance carrier.
7. A Lifeline subscriber's local service will not be disconnected for non-payment of regulated toll charges. Local service may be denied for non-payment of local *service* in accordance with Section A2. Access to toll service may be denied for non-payment of regulated tolls. A Lifeline subscriber's request for reconnection of local service will not be denied if the service was previously denied for non-payment of toll charges.
8. *The non-discounted federal Lifeline credit amount will be passed along to resellers ordering local service at the prescribed resale discount from this Tariff, for their eligible end users. The additional credit to the end user will be the responsibility of the reseller. Eligible Telecommunications Carriers, as defined by the FCC, are required to establish their own Lifeline programs.*

B. Eligibility

1. To be eligible for a Lifeline credit, a customer must be a current recipient of any one of the following low income assistance programs.
 - a. Temporary Assistance to Needy Families (TANF), previously known as AFDC
 - b. Supplemental Security Income (SSI)
 - c. Food Stamps
 - d. Medicaid, as provided under TennCare
2. Additionally, a customer with total gross annual income that does not exceed 125% of the federal poverty income guidelines may apply directly to the Tennessee Regulatory Authority (TRA) for Lifeline eligibility certification.
3. All applications for service are subject to verification with the TRA or state agency responsible for administration of the qualifying program.

BELLSOUTH
TELECOMMUNICATIONS, INC.
TENNESSEE
ISSUED: October 8, 1999
BY: President - Tennessee
Nashville, Tennessee

GENERAL SUBSCRIBER SERVICES TARIFF

Sixth Revised Page 76
Cancels Fifth Revised Page 76

EFFECTIVE: November 8, 1999

A3. BASIC LOCAL EXCHANGE SERVICE**A3.31 Lifeline (Cont'd)****A3.31.2 Regulations (Cont'd)****C. Certification**

1. Proof of eligibility in any of the qualifying low income assistance programs should be provided to the Company at the time of application for service. The Lifeline credit will not be established until proof of eligibility has been received by the Company. If the customer requests installation prior to the Company's receipt of proof of eligibility, the requested service will be provided without the Lifeline credit. When eligibility documentation is provided subsequent to installation, the Lifeline credit will be provided on a going forward basis.
2. The Company reserves the right to periodically audit its records, working in conjunction with the appropriate state agencies, for the purpose of determining continuing eligibility. Information obtained during such audit will be treated as confidential information to the extent required under State and Federal laws. The use or disclosure of information concerning enrollees will be limited to purposes directly connected with the administration of the Lifeline plan.
3. When a customer is determined to be ineligible as a result of an audit, the Company will contact the customer. If the customer cannot provide eligibility documentation, the Lifeline credit will be discontinued.
4. Resellers providing Lifeline service from this tariff are responsible for determining proof of eligibility prior to requesting the service. Disclosure requirements described in 2. Preceding are applicable to resellers of Lifeline service.

(N)

A3.31.3 Rates and Charges**A. General**

1. Lifeline is provided as a monthly credit on the eligible residential subscriber's access line bill for local service.
2. Service Charges in Section A4. are applicable for installing or changing Lifeline service.
3. Link-Up connection assistance in Section A4. may be available for installing or relocating Lifeline service.
4. The Secondary Service Charge in Section A4. is not applicable when existing service is converted intact to Lifeline.

- B. The total Lifeline credit consists of one federal credit plus one state credit**
- (1) Federal credit

	Monthly Credit	USOC
(a) Temporary Assistance to Needy Families (TANF)	\$7.00	ASGFA
(b) Supplemental Security Income (SSI)	7.00	ASGFS
(c) Food Stamps	7.00	ASGFC
(d) Medicaid (under TennCare)	7.00	ASGS1
(e) TRA Certified	7.00	ASGTC
(2) State credit		
(a) One per Lifeline	3.50	CRA

REQUEST: For each month from January 1, 1999 through February 29, 2000 identify the:

- (a) total number of BellSouth Telecommunications, Inc.'s Lifeline customers in Shelby County, Tennessee whose service was terminated for nonpayment; and
- (b) the number of BellSouth Telecommunications, Inc., Lifeline customers in Shelby County, Tennessee customer whose service was terminated for nonpayment of:
 - (i) local service,
 - (ii) long distance service, and
 - (iii) other service.

RESPONSE: The information requested is not available.

BellSouth Telecommunications, Inc.
TN Docket 00-00230
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Item No. 6
Page 1

REQUEST: Does BellSouth Telecommunications Inc. offer Lifeline customers blocking of long distance service?

If yes, identify the tariff section and tariff page that provides for such blocking and the rate charged.

RESPONSE: Yes. Please see BellSouth's Tennessee General Subscriber Services Tariff A3.31.2.A.4 (attached to BellSouth's Response to Item No. 4) and A13.20 (attached to this Response).

BELLSOUTH
TELECOMMUNICATIONS, INC.
TENNESSEE
ISSUED: January 21, 2000
BY: President - Tennessee
Nashville, Tennessee

GENERAL SUBSCRIBER SERVICES TARIFF

Fifth Revised Page 13.4
Cancels Fourth Revised Page 13.4

EFFECTIVE: February 21, 2000

A13. MISCELLANEOUS SERVICE ARRANGEMENTS**A13.20 Call Screening And Restriction Services - Customized Code Restriction (CCR)**

This service is a Flex-Price service and is regulated under terms and conditions as described in A2.3.26 of this Tariff.

A13.20.1 General

Customized Code Restriction is a service which enables customers to restrict certain types of outgoing calls from being placed over their exchange lines/trunks. This capability is provided only by means of recorded announcement restriction. It is offered with options containing various sets of codes to be restricted, and is available to basic exchange customers with individual line residence or business service or PBX trunks in either flat, message or measured rate service environments.

A13.20.2 Regulations

- A. Customers may subscribe to whichever option meets their needs, but only one option may be provided on a line/trunk or group of lines/trunks. Also, options of this service may not be combined with Selective Class of Call Screening in A13.12. or Toll Trunks specified in A13.14. The options of this service with their respective sets of codes are listed under A13.20.2.H. following and are available at the rates specified in A13.20.3.
- B. CCR is furnished only from central offices equipped to provide this service and where facilities permit.
- C. When CCR is provided from central offices other than the customer's normal serving central office, Foreign Central Office or Foreign Exchange charges as specified in tariff Section A9., whichever is appropriate, will apply to all lines/trunks equipped with this service.
- D. CCR does not provide restriction of non-chargeable calls to Company numbers, such as repair service, public emergency service numbers (911), or toll free 1+8XX calling (including 1+8XX calling card calls).
- E. Subscribing to CCR does not relieve customers of responsibility for calls charged to their numbers.
- F. Customers who subscribe to CCR options which restrict operator access have the responsibility to notify all users of their service that an operator cannot be reached.
- G. The Company shall not be liable to any person for damages of any nature or kind arising out of, or resulting from, or in connection with the provision of this service, including without limitation, the inability of station users to access the operator for any purpose, or any other restricted codes specified for the options listed in A13.20.3.
- H. CCR - Options

The codes shown for CCR options are not to be considered all inclusive. Codes may be changed and new or different codes may be added as deemed appropriate by the Company.

- 1. Option #1
1+, 0-, 0+, 00-, (1+/0+) 411, 976 & 900, IDDD 01+, IDDD 011+, N11 Service (311, 511, 611, 811), 101XXXX (T)

- 2. Option #2

- a. Restricted Codes

0-, 0+, 00-, IDDD 01+, 976 (T)

- b. Restricted Codes (N)

0-, 0+, IDDD 011+, IDDD 101XXX+011+, IDDD 101XXXX+011+, 976, 1+976 (N)

- 3. Option #3 Restricted Codes

Vacant Code Recording 1+, 0-, 0+, 00-, IDDD 01+, 011+, NPA 900, 101XXXX

A13. MISCELLANEOUS SERVICE ARRANGEMENTS

A13.20 Call Screening And Restriction Services - Customized Code Restriction (CCR) (Cont'd)

A13.20.2 Regulations (Cont'd)

H. CCR - Options (Cont'd)

4. Option #4
 - a. Restricted Codes
976, 1+976, 900, 1+900 (T)
 - b. Restricted Codes (T)
976, 1+976, 900, 1+900, IDDD 011+, IDDD 10XXX+011+, IDDD 101XXXX+011+ (N)
5. Option #6
 - a. Restricted Codes (T)
976, 1+976, 900, 1+900, N11 Service (311, 511, 611, 811) (T)
 - b. Restricted Codes (T)
976, 1+976, 900, 1+900, N11 Service (311, 511, 611, 811), IDDD 011+, IDDD 10XXX+011+, IDDD 101XXXX+011+ (N)
6. Option #7 Restricted Codes (N)
1+InterLATA, Vacant Code Recording 0-, 0+, 00-, (1+/0+) 411, 976, NPA 900, IDDD01, IDDD011+, N11 Service (311, 511, 611, 811), and 101XXXX.

- I. Customized Code Restrictions can be suspended as specified in A2.3.16 of this Tariff. During the period of suspension, no recurring charge applies.
- J. Customized Code Restriction will be established and provided at no charge for customers receiving Lifeline service from A3.31 of this Tariff.
- K. Residence customers who subscribe to any of the Area Plus® services may restrict 1+InterLATA calls while allowing 1+IntraLATA calls to be completed by subscribing to Customized Code Restriction Option #7.

A13.20.3 Rates And Charges

- A. The following rates and charges are in addition to all applicable service charges, monthly rates and nonrecurring charges for exchange lines/trunks and other services or equipment with which they may be associated. Only one option may be provided on a line/trunk or group of lines/trunks.

1. Option #1 Restricted Codes

	Monthly Rate	USOC	
(a) Residence Line or PBX trunk, each	\$2.00	CREX1	(T)
(b) Business Line or PBX trunk, each	3.75	CREX1	(T)
2. Option #2 Restricted Codes			
a. Option #2a			
(1) Rates			(T)
(a) Residence Line or PBX trunk, each	2.00	CREX2	(T)
(b) Business Line or PBX trunk, each	3.75	CREX2	(T)
b. Option #2b			(N)
(1) Rates			(N)
(a) Residence Line or PBX trunk, each	2.00	CREXW	(N)
(b) Business Line or PBX trunk, each	3.75	CREXW	(N)

Note 1: Service charges in Section A4. of this Tariff do not apply when a business or residence customer subscribes to Options #4 and #6. Where Code Restriction is available in association with services provided in Sections A12., A110., and A111., of this Tariff, the charges prescribed therein for Code Restriction apply. (M)

BELLSOUTH
TELECOMMUNICATIONS, INC.
TENNESSEE
ISSUED: January 21, 2000
BY: President - Tennessee
Nashville, Tennessee

GENERAL SUBSCRIBER SERVICES TARIFF

Second Revised Page 14.0.1
Cancels First Revised Page 14.0.1

EFFECTIVE: February 21, 2000

A13. MISCELLANEOUS SERVICE ARRANGEMENTS**A13.20 Call Screening And Restriction Services - Customized Code Restriction (CCR)
(Cont'd)****A13.20.3 Rates And Charges (Cont'd)****A. (Cont'd)¹****3. Option #3 Restricted Codes**

		Monthly Rate	USOC	
	(a) Residence Line or PBX trunk, each	\$2.00	CREX3	(M)(T)
	(b) Business Line or PBX trunk, each	3.75	CREX3	(M)(T)
4. Option #4 Restricted Codes ²				(M)
a. Option #4a				(N)
(1) Rates				(N)
	(a) Residence Line or PBX trunk, each	-	CREX4	(M)
	(b) Business Line or PBX trunk, each	-	CREX4	(M)
b. Option #4b				(N)
(1) Rates				(N)
	(a) Residence Line or PBX trunk, each	-	CREXX	(N)
	(b) Business Line or PBX trunk, each	-	CREXX	(N)
5. Option #6 Restricted Codes ²				(T)
a. Option #6a				(T)
(1) Rates				
	(a) Residence Line or PBX trunk, each	-	CREX6	
	(b) Business Line or PBX trunk, each	-	CREX6	
b. Option #6b				(N)
(1) Rates				(N)
	(a) Residence Line or PBX trunk, each	-	CREXY	(N)
	(b) Business Line or PBX trunk, each	-	CREXY	(N)
6. Option #7 Restricted Codes ³				
(a) Residence Line, each		2.00	CREX7	

A13.21 Reserved For Future Use**A13.22 Reserved For Future Use****A13.23 Reserved For Future Use**

Note 1: Service charges in Section A4. of this Tariff do not apply when a business or residence customer subscribes to Options #4 and #6. Where Code Restriction is available in association with services provided in Sections A12., A110., and A111., of this Tariff, the charges prescribed therein for Code Restriction apply.

Note 2: On the first occurrence of adjustment due to unauthorized or mistaken 900 and/or 976 calls, blocking shall be offered to the customer at no charge. However, on the second occurrence of adjustment or customer refusal to pay the 900 and/or 976 charges, Company initiated blocking may be imposed.

Note 3: Option #7 is restricted to subscribers of any Area Plus® service.

BellSouth Telecommunications, Inc.
TN Docket 00-00230
CAD's Request for Information
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Item No. 7
Page 1

REQUEST: Does BellSouth Telecommunications Inc. offer Lifeline customers blocking of access to directory assistance?

If yes, identify the tariff section and tariff page that provides for such blocking.

RESPONSE: BellSouth does not offer a blocking feature that only blocks access to directory assistance. BellSouth does, however, offer an option which, among other things, blocks toll calls as well as calls to directory assistance. *See* BellSouth's Tennessee General Subscribers Services Tariff A.13.20 (attached to BellSouth's Response to Item No. 6).

REQUEST: Is it BellSouth Telecommunications Inc.'s position that it is prohibited by federal or state statute, rule, or regulatory order from blocking or offering blocking of access to directory assistance to Lifeline customers?

If yes, please identify the specific statute(s), rule(s), regulatory order(s) that prohibits BellSouth Telecommunications, Inc. from blocking or offering blocking of access to directory assistance to Lifeline customers. In citing orders please provide the agency issuing the order, the docket number, the date of issue, and the paragraph number if applicable.

RESPONSE: BellSouth objects to this Request on the grounds that it calls for a legal conclusion and improperly seeks the work product and/or mental impressions of BellSouth's attorneys. Without waiving this objection, BellSouth responds that FCC's Report and Order in Docket 96-45 ("Universal Service Order") released May 8, 1997 does not prohibit the offering of a directory assistance block to Lifeline customers. This Order does not expressly address the blocking of directory assistance services, but it does allow the blocking of toll services to Lifeline customers in certain circumstances.

BellSouth Telecommunications, Inc.
TN Docket 00-00230
CAD's Request for Information
April 4, 2000
Item No. 9
Page 1

REQUEST: It is BellSouth Telecommunications Inc.'s position that the Tennessee Regulatory Authority is prohibited by federal or state statute, rule or regulatory order from requiring BellSouth Telecommunications Inc. or other service providers from offering directory assistance blocking?

If yes, please identify the specific statute(s), rule(s), or order(s) that prohibit the Tennessee Regulatory Authority from requiring the blocking or the offering of such blocking. In citing orders please provide the agency issuing the order, the docket number, and the date of issue, and the paragraph number if applicable.

RESPONSE: Please refer to BellSouth's Response to Item No. 8.

BellSouth Telecommunications, Inc.
TN Docket 00-00230
CAD's Request for Information
April 4, 2000
Item No. 10
Page 1

REQUEST: Does BellSouth Telecommunications Inc. offer any customers blocking of access to directory assistance?

If yes, identify the tariff section and tariff page that provides for such blocking.

RESPONSE: Please refer to BellSouth's Response to Item No. 7.

BellSouth Telecommunications, Inc.
TN Docket 00-00230
CAD's Request for Information
April 4, 2000
Item No. 11
Page 1

REQUEST: Is it technologically feasible to provide directory assistance blocking on a stand alone basis?

RESPONSE: Yes, it is "technologically feasible."

BellSouth Telecommunications, Inc.
TN Docket 00-00230
CAD's Request for Information
April 4, 2000
Item No. 12
Page 1

REQUEST: Is it feasible to provide directory assistance blocking after a predetermined monthly allowance?

RESPONSE: No. Please refer to the testimony of Mr. Ed Davis during the hearing in this docket.

BellSouth Telecommunications, Inc.
TN Docket 00-00230
CAD's Request for Information
April 4, 2000
Item No. 13
Page 1

REQUEST: Please identify any other Regional Bell Operating Company (RBOC) or other incumbent local exchange company that to BellSouth Telecommunications Inc.'s knowledge offers blocking of directory assistance?

RESPONSE: BellSouth objects to this Request on the grounds that it is overly broad and unduly burdensome. Without waiving this objection, BellSouth believes that Bell Atlantic may offer a directory assistance block to resellers. BellSouth is not aware of the specifics of any such service Bell Atlantic may offer.

BellSouth Telecommunications, Inc.
TN Docket 00-00230
CAD's Request for Information
April 4, 2000
Item No. 14
Page 1

REQUEST: For BellSouth Telecommunications, Inc.'s Lifeline service customers whose service has been terminated for nonpayment and later restored, identify the average number of days between termination and restoration of service.

RESPONSE: BellSouth objects to this request on the grounds that it does not maintain records responsive to this request in the ordinary course of its business and that the information requested is not readily available from records BellSouth does maintain in the ordinary course of business.

BellSouth Telecommunications, Inc.
TN Docket 00-00230
CAD's Request for Information
April 4, 2000
Item No. 15
Page 1

REQUEST: For BellSouth Telecommunications, Inc.'s Lifeline service customers who are delinquent in paying their telephone bills, identify the average numbers of days that the bills are delinquent.

RESPONSE: BellSouth objects to this request on the grounds that it does not maintain records responsive to this request in the ordinary course of its business and that the information requested is not readily available from records BellSouth does maintain in the ordinary course of business.

REQUEST: (a) Please confirm or correct the following comparison of the amount billed a BellSouth Lifeline customer in a Group 5 exchange and the amount that would be billed to a reseller who would resell BellSouth Telecommunications, Inc.'s Lifeline service to the same customer.

Group 5 Exchange	BellSouth Charge to Lifeline Customer When the Customer is a Customer of BellSouth	BellSouth Charge to Reseller When Lifeline Customer is a Customer of the Reseller	Amount Collected from Reseller Exceeds Amount Collected From BellSouth Lifeline Customer
Base Rate	\$12.15	\$10.21	(\$1.94)
Subscriber Line Charge	3.50	3.50	0.00
Total Charge Before Credit	\$15.65	\$13.71	(\$1.94)
Lifeline Credit (Federal Support)	(7.00)	(7.00)	0.00
Intrastate Credit	(3.50)	0.00	3.50
Total Collected from Lifeline Customer	\$5.15	\$6.71	\$1.56

(b) Does BellSouth Telecommunications, Inc., agree that even with the 16% discount on resold service, it bills more to a reseller who provides service to a Lifeline customer than it would bill the same Lifeline customer served directly by BellSouth?

RESPONSE: Please see the attached document which was introduced as an exhibit during the hearing in this docket.

**Tennessee
Application of LifeLine Rates**

<u>Billable Item</u>	<u>BST End User</u>	<u>Reseller</u>
1FR	\$12.15	\$12.15
TouchTone	\$1.00	\$1.00
Total Tariffed Charges	\$13.15	\$13.15
Less Resale Discount	\$0.00	(\$2.10)
Plus Federal SLC	\$3.50	\$3.50
Less Federal Discount	(\$7.00)	(\$7.00)
Less State Discount	(\$3.50)	\$0.00
Net Charge	\$6.15	\$7.55

April 11, 2000 Docket 00-00230, Discount Communications, Inc.

REQUEST: For each month January 1999 through February 2000 identify the number of Lifeline lines provided by BellSouth Telecommunications, Inc. to resellers in Shelby County, Tennessee.

RESPONSE: BellSouth objects to this request on the grounds that it does not maintain records responsive to this request in the ordinary course of its business and that the information requested is not readily available from records BellSouth does maintain in the ordinary course of business. Without waiving this objection, BellSouth responds by providing the following number of Lifeline accounts provided to resellers whose end-user customers have Shelby County tax codes:

January	99	-	38
February	99	-	74
March	99	-	159
April	99	-	245
May	99	-	318
June	99	-	362
July	99	-	392
August	99	-	400
September	99	-	410
October	99	-	444
November	99	-	482
December	99	-	539
January	00	-	592
February	00	-	752

These are "end of the month" numbers.

The "DA Charges" column lists the amount BellSouth billed Discount Communications for interstate directory assistance charges. No local or intrastate directory assistance charges are included in this column because BellSouth's tariff implementing charges for local and intrastate directory assistance had not been approved as of May 4, 1999.

Again, these are amounts BellSouth billed Discount Communications. BellSouth does not know how much Discount Communications, in turn, charges its end-user customers for these services.

REQUEST: For each month January 1999 through February 2000 identify the amount billed Discount Communications for:

- (a) Lifeline Customers, and
- (b) Directory Assistance Service provided to Lifeline Customers.

RESPONSE: Generally, billed amounts for individual end users are available only through page by page review of each bill. Because each monthly bill for Discount Communications contains thousands of pages of information, BellSouth objects to this Request on the grounds that it is overly broad and unduly burdensome.

Without waiving these objections, BellSouth has extracted the attached information from the May 4, 1999 bill which had been created as a Diskette Analyzer Bill ("DAB") on CD-ROM for Discount Communications. This DAB was discussed by BellSouth witness David Scollard during the hearing in this docket. The following items explain the information contained in the attachment.

The "TN" column lists telephone numbers of Discount Communications' end-user Lifeline customers as of May 4, 1999. In light of the CPNI rules, BellSouth has redacted the last four digits of each of these numbers.

The "Monthly Service Amount" column lists the amount BellSouth billed Discount Communications for items such as monthly recurring charges for local services, Touchtone, vertical services, etc.

The "OC&C Amount" column lists the amount BellSouth billed Discount Communications for items such as installation charges for new service; partial month's billing for new service; partial month's credit for service disconnect; etc.

The "Itemized Calls" column lists the amount BellSouth billed Discount Communications for items such as intraLATA toll charges; collect calls; operator-assisted calls (i.e. verification, interrupt, etc.); "per use" services (i.e. Call Return, 3-Way Calling, BusyConnect); etc.

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901213	\$19.18	\$16.62	\$0.00	\$0.00
901265	\$24.31	\$0.00	\$0.63	\$0.00
901265	\$8.60	\$0.00	\$0.00	\$0.00
901265	\$10.28	\$0.00	\$0.74	\$0.00
901265	\$7.88	\$0.00	\$0.00	\$0.00
901265	\$7.76	\$0.00	\$0.00	\$0.00
901265	\$10.28	\$0.00	\$0.00	\$0.00
901265	\$32.20	\$13.05	\$0.00	\$0.00
901265	\$32.50	\$0.00	\$2.94	\$0.00
901265	\$10.28	\$0.53	\$0.00	\$0.00
901265	\$21.58	\$0.00	\$0.00	\$0.00
901265	\$10.28	\$0.00	\$0.00	\$0.71
901265	\$10.28	\$0.00	\$0.00	\$0.00
901265	\$21.58	\$0.00	\$0.00	\$0.00
901265	\$24.10	-\$3.04	\$0.00	\$0.00
901266	\$10.49	\$0.00	\$0.00	\$0.00
901272	\$12.89	\$0.00	\$0.00	\$0.00
901272	\$10.49	\$0.00	\$0.00	\$0.00
901272	\$10.49	\$0.00	\$0.00	\$0.00
901272	\$21.58	\$0.00	\$0.00	\$0.71
901272	\$10.49	\$0.00	\$0.00	\$0.00
901272	\$16.37	\$0.00	\$0.00	\$0.00
901272	\$10.49	\$0.00	\$0.00	\$0.00
901272	\$10.37	\$0.00	\$0.00	\$0.71
901272	\$19.18	\$28.31	\$0.00	\$1.42
901272	\$10.49	\$0.00	\$0.00	\$0.00
901274	\$12.89	\$0.00	\$0.00	\$0.00
901274	\$21.58	\$15.93	\$0.00	\$0.00
901274	\$12.89	\$0.00	\$0.00	\$0.00
901276	\$13.98	\$0.00	\$0.00	\$0.00
901276	\$11.63	\$0.00	\$0.00	\$0.00
901276	\$10.49	\$0.00	\$0.00	\$0.00
901276	\$12.89	\$0.00	\$0.00	\$0.00
901278	\$19.18	\$0.00	\$0.00	\$0.00
901278	\$19.18	\$3.50	\$0.00	\$0.00
901278	\$7.97	\$0.00	\$0.00	\$0.00
901278	\$12.38	\$1.13	\$0.00	\$0.00
901285	\$21.58	\$21.69	\$0.00	\$0.00
901287	\$24.52	\$6.38	\$0.00	\$0.00
901288	\$8.56	\$0.00	\$0.00	\$0.00
901320	\$19.18	\$6.06	\$0.00	\$0.00
901320	\$19.18	\$7.98	\$0.00	\$0.00
901320	\$10.49	\$0.00	\$0.00	\$0.00
901323	\$26.53	\$0.00	\$0.00	\$0.00
901323	\$12.89	\$0.00	\$0.00	\$0.71
901323	\$19.18	\$12.66	\$0.00	\$0.00
901323	\$19.18	\$29.15	\$0.00	\$0.00
901323	\$10.49	\$0.00	\$0.00	\$0.00
901323	\$19.18	\$12.35	\$0.00	\$0.00

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901323	\$10.49	\$0.00	\$0.00	\$0.00
901324	\$10.07	-\$0.34	\$0.00	\$0.00
901324	\$19.18	\$13.00	\$0.00	\$0.00
901324	\$10.49	\$0.00	\$0.00	\$0.00
901324	\$19.18	\$0.00	\$0.00	\$0.00
901324	\$12.89	\$0.00	\$0.00	\$0.00
901324	\$19.18	\$20.89	\$0.00	\$0.00
901324	\$24.13	\$0.00	\$0.00	\$0.00
901324	\$7.97	\$0.00	\$0.00	\$0.00
901327	\$19.18	\$6.91	\$0.00	\$0.00
901327	\$18.77	\$0.00	\$1.11	\$0.00
901327	\$18.77	\$0.00	\$1.17	\$0.00
901327	\$19.18	\$6.06	\$0.00	\$0.00
901327	\$21.58	\$0.00	\$0.00	\$0.00
901332	\$21.29	\$0.00	\$0.00	\$0.00
901332	\$26.53	\$0.00	\$0.00	\$0.00
901332	\$12.38	-\$2.08	\$0.00	\$0.71
901332	\$21.58	\$0.00	\$0.00	\$0.00
901332	\$10.37	\$0.00	\$0.00	\$0.00
901332	\$19.18	\$13.43	\$0.00	\$0.00
901345	\$12.89	\$0.00	\$0.00	\$0.00
901345	\$24.13	\$20.91	\$1.11	\$0.00
901345	\$19.18	\$0.00	\$0.00	\$0.00
901346	\$19.18	\$4.77	\$0.00	\$0.00
901346	\$7.97	\$0.00	\$0.00	\$0.00
901353	\$19.18	\$5.42	\$0.00	\$0.00
901353	\$13.73	\$0.00	\$0.00	\$0.00
901353	\$13.73	\$0.00	\$0.00	\$0.00
901353	\$10.49	\$0.00	\$0.00	\$0.00
901353	\$19.18	\$4.77	\$0.00	\$0.00
901353	\$12.89	\$0.00	\$0.00	\$0.00
901353	\$13.73	\$0.00	\$0.00	\$0.00
901353	\$12.89	\$0.00	\$2.22	\$0.00
901353	\$12.89	\$0.00	\$1.48	\$0.00
901353	\$12.89	\$0.00	\$1.54	\$0.00
901353	\$19.18	\$3.50	\$0.00	\$0.00
901353	\$19.18	\$0.00	\$0.00	\$0.00
901353	\$14.48	\$0.00	\$0.00	\$0.00
901353	\$19.18	\$15.68	\$0.00	\$0.00
901353	\$19.18	\$0.00	\$0.00	\$0.00
901353	\$7.97	-\$0.62	\$0.00	\$0.00
901353	\$10.49	\$0.00	\$0.47	\$0.00
901354	\$24.13	\$5.15	\$0.00	\$0.00
901357	\$13.98	\$0.00	\$0.00	\$0.00
901357	\$19.18	\$13.00	\$6.29	\$0.00
901357	\$10.49	\$0.00	\$0.00	\$0.00
901357	\$12.89	\$0.00	\$0.00	\$0.00
901357	\$12.89	\$0.00	\$0.00	\$0.00
901358	\$19.18	\$6.69	\$0.00	\$0.00

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901358	\$13.73	\$0.00	\$0.00	\$0.00
901358	\$24.13	\$15.97	\$0.00	\$0.00
901358	\$13.73	\$0.00	\$0.00	\$0.00
901358	\$19.18	\$0.00	\$0.00	\$0.00
901362	\$28.51	\$0.53	\$0.00	\$0.00
901363	\$10.49	\$0.00	\$0.00	\$0.00
901365	\$12.89	\$0.00	\$0.00	\$0.00
901367	\$12.89	\$0.00	\$0.00	\$0.00
901369	\$19.18	\$1.49	\$0.00	\$0.00
901375	\$10.49	\$0.00	\$0.00	\$0.00
901377	\$7.97	\$0.00	\$0.00	\$0.00
901385	\$28.63	\$1.94	\$1.85	\$0.00
901387	\$24.13	\$0.70	\$0.00	\$0.00
901396	\$12.89	\$0.00	\$0.00	\$0.00
901396	\$19.18	\$15.99	\$0.00	\$0.00
901398	\$19.18	\$0.53	\$0.00	\$0.71
901398	\$19.18	\$0.00	\$1.17	\$0.00
901398	\$19.43	\$0.00	\$0.00	\$0.00
901421	\$10.28	\$0.00	\$0.00	\$1.42
901421	\$7.76	\$0.00	\$0.00	\$0.00
901421	\$10.28	\$0.00	\$0.00	\$0.00
901421	\$10.28	\$0.00	\$0.00	\$0.00
901421	\$21.58	\$0.00	\$0.00	\$0.00
901421	\$24.10	\$0.00	\$0.00	\$0.00
901421	\$10.28	\$0.00	\$0.00	\$0.00
901421	\$19.18	\$0.00	\$0.00	\$0.00
901422	\$10.28	\$0.00	\$0.00	\$0.00
901422	\$10.28	\$0.00	\$0.00	\$0.00
901422	\$10.28	\$0.00	\$9.45	\$0.00
901422	\$7.76	\$0.00	\$0.00	\$4.97
901422	\$21.58	\$0.00	\$0.00	\$0.00
901422	\$10.28	\$0.00	\$0.00	\$0.00
901422	\$10.28	\$0.00	\$0.00	\$0.00
901422	\$10.28	\$0.00	\$0.37	\$0.00
901422	\$21.58	\$5.01	\$0.00	\$0.00
901422	\$10.28	\$0.00	\$0.00	\$0.00
901422	\$28.51	\$0.00	\$0.00	\$0.00
901423	\$24.10	\$0.00	\$0.00	\$0.00
901423	\$10.28	\$0.00	\$0.00	\$0.00
901423	\$13.22	\$0.00	\$0.17	\$0.00
901423	\$21.58	\$5.66	\$0.00	\$0.00
901423	\$21.58	\$0.00	\$2.10	\$0.00
901423	\$10.28	\$0.00	\$0.00	\$0.00
901423	\$21.58	\$0.00	\$0.00	\$0.00
901423	\$10.28	\$0.00	\$4.44	\$0.71
901423	\$35.05	\$0.00	\$0.00	\$0.00
901423	\$16.16	\$0.00	\$0.00	\$0.00
901423	\$5.36	\$0.00	\$0.00	\$0.00
901423	\$21.58	\$5.77	\$0.00	\$0.00

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901424	\$21.58	\$11.76	\$0.00	\$0.00
901424	\$24.10	\$0.00	\$0.00	\$0.00
901424	\$10.28	\$0.00	\$0.00	\$0.00
901424	\$24.94	\$0.00	\$0.00	\$0.00
901424	\$16.16	\$0.00	\$0.00	\$0.00
901424	\$22.42	\$0.00	\$0.00	\$0.00
901424	\$10.28	\$0.00	\$18.27	\$0.00
901427	\$10.28	\$0.00	\$0.00	\$0.00
901427	\$23.68	\$0.00	\$0.00	\$0.00
901427	\$21.58	\$0.00	\$0.00	\$0.00
901427	\$10.28	\$0.00	\$0.00	\$0.00
901427	\$21.58	\$0.00	\$3.53	\$0.00
901427	\$22.67	\$0.00	\$0.00	\$0.00
901452	\$21.58	\$3.50	\$0.74	\$0.00
901452	\$6.71	\$0.00	\$0.00	\$0.00
901452	\$12.89	\$0.00	\$0.00	\$0.00
901452	\$10.49	\$0.00	\$0.00	\$0.00
901452	\$10.49	\$0.00	\$0.00	\$0.00
901454	\$19.18	\$0.00	\$0.00	\$0.00
901454	\$7.97	-\$0.80	\$0.00	\$0.00
901454	\$14.97	\$0.00	\$0.00	\$0.00
901458	\$12.89	\$0.00	\$10.48	\$0.00
901458	\$10.49	\$0.00	\$0.00	\$0.00
901458	\$26.23	\$29.61	\$0.00	\$0.00
901458	\$19.18	\$18.11	\$0.00	\$0.00
901465	\$20.02	\$11.37	\$0.00	\$0.00
901465	\$13.73	\$0.00	\$1.68	\$0.00
901521	\$12.89	\$0.00	\$0.00	\$0.00
901522	\$19.18	\$6.69	\$0.00	\$0.00
901522	\$12.89	\$0.00	\$0.00	\$0.00
901522	\$10.49	\$0.23	\$0.00	\$0.71
901522	\$12.59	\$0.00	\$0.00	\$0.00
901522	\$12.89	\$0.00	\$0.00	\$0.00
901522	\$12.89	\$0.00	\$0.00	\$0.00
901522	\$14.78	\$0.00	\$0.00	\$0.00
901522	\$12.89	\$0.00	\$0.00	\$0.00
901522	\$12.89	\$0.00	\$0.00	\$0.00
901522	\$12.89	\$0.00	\$0.00	\$0.00
901522	\$12.89	\$0.00	\$0.00	\$0.00
901522	\$12.89	\$0.00	\$0.00	\$0.00
901522	\$12.89	\$0.00	\$0.00	\$0.00
901522	\$12.89	\$0.00	\$0.00	\$0.00
901523	\$10.49	\$0.00	\$0.00	\$0.71
901523	\$7.97	\$3.36	\$0.00	\$0.00
901523	\$19.18	\$7.55	\$0.00	\$1.42
901523	\$12.89	\$0.00	\$0.00	\$0.00
901523	\$7.97	-\$0.27	\$0.00	\$0.00
901523	\$21.29	\$0.00	\$0.00	\$0.00
901523	\$7.97	-\$0.27	\$0.00	\$0.00
901523	\$19.18	\$15.99	\$0.00	\$0.00

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901523	\$10.49	\$0.00	\$0.00	\$0.00
901523	\$12.89	\$0.00	\$0.00	\$0.00
901523	\$19.18	\$11.17	\$0.00	\$0.00
901523	\$12.89	\$0.00	\$0.00	\$0.00
901523	\$10.49	\$0.00	\$0.00	\$0.00
901523	\$19.18	\$14.36	\$0.00	\$0.00
901523	\$12.89	\$0.00	\$0.00	\$0.00
901523	\$10.49	\$0.00	\$2.10	\$0.00
901523	\$7.97	\$0.00	\$0.00	\$0.00
901523	\$10.49	\$0.00	\$0.00	\$2.13
901523	\$21.58	\$0.00	\$0.00	\$0.00
901523	\$10.49	\$0.00	\$0.00	\$0.00
901523	\$10.49	\$0.00	\$0.00	\$0.00
901524	\$10.49	\$9.60	\$0.00	\$0.00
901525	\$10.49	\$0.00	\$0.00	\$0.00
901525	\$23.68	\$0.53	\$0.00	\$0.00
901526	\$19.18	\$0.00	\$0.00	\$0.00
901526	\$10.49	\$0.00	\$0.00	\$0.00
901527	\$12.38	-\$2.91	\$0.00	\$0.00
901527	\$12.89	\$0.00	\$0.00	\$0.00
901527	\$12.89	\$0.00	\$0.00	\$0.00
901527	\$10.49	\$0.00	\$0.00	\$0.00
901527	\$19.18	\$14.72	\$0.00	\$0.00
901527	\$12.89	\$0.00	\$0.00	\$0.00
901527	\$12.89	\$0.00	\$0.00	\$0.00
901527	\$12.89	\$0.00	\$0.00	\$0.00
901527	\$12.89	\$0.00	\$0.00	\$0.00
901527	\$12.89	\$0.00	\$0.00	\$0.00
901527	\$21.58	\$0.00	\$0.00	\$0.00
901529	\$10.49	\$0.00	\$0.00	\$0.00
901529	\$12.89	\$0.00	\$0.00	\$0.00
901529	\$22.25	\$16.52	\$0.00	\$0.00
901529	\$26.53	\$0.00	\$0.00	\$0.71
901529	\$12.68	\$0.00	\$0.00	\$0.00
901546	\$12.38	\$6.06	\$0.00	\$0.00
901547	\$19.18	\$14.92	\$0.00	\$0.00
901547	\$19.18	\$1.49	\$0.00	\$0.00
901547	\$19.18	\$3.50	\$0.00	\$0.00
901572	\$19.18	\$0.00	\$0.00	\$0.00
901578	\$19.18	\$13.64	\$0.00	\$0.00
901578	\$22.67	\$0.00	\$0.00	\$0.00
901578	\$21.58	\$0.00	\$0.00	\$0.71
901578	\$19.18	\$9.25	\$0.00	\$0.00
901578	\$12.89	\$0.00	\$0.00	\$0.00
901579	\$12.89	-\$0.35	\$0.00	\$0.00
901658	\$32.50	\$0.00	\$0.00	\$0.00
901660	\$19.18	\$0.00	\$0.00	\$0.00
901660	\$11.12	\$0.00	\$0.00	\$0.00
901660	\$10.28	\$0.00	\$0.00	\$0.00
901660	\$10.28	\$0.00	\$0.00	\$0.00

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901686	\$30.10	\$23.99	\$1.85	\$0.00
901686	\$24.10	\$0.00	\$0.00	\$0.00
901722	\$12.89	\$0.00	\$0.00	\$0.00
901722	\$19.18	\$0.00	\$2.96	\$0.00
901722	\$19.18	\$10.52	\$0.00	\$0.00
901722	\$12.89	\$0.00	\$0.00	\$0.00
901723	\$9.82	\$0.00	\$0.00	\$0.71
901723	\$29.98	\$0.00	\$0.00	\$0.00
901725	\$10.49	\$0.00	\$0.00	\$0.00
901725	\$10.49	\$0.00	\$0.00	\$0.00
901725	\$19.18	\$8.32	\$0.00	\$0.00
901726	\$1.06	\$0.00	\$0.17	\$0.00
901726	\$19.18	\$2.80	\$0.00	\$0.00
901728	\$12.89	\$0.00	\$0.00	\$0.00
901743	\$19.18	\$14.27	\$0.00	\$0.00
901743	\$19.18	\$0.00	\$0.00	\$0.00
901743	\$7.97	\$0.00	\$0.00	\$0.00
901743	\$19.18	\$0.00	\$0.00	\$0.00
901743	\$19.18	\$21.41	\$0.00	\$0.00
901743	\$10.49	\$0.00	\$0.00	\$0.00
901743	\$21.58	\$0.00	\$0.00	\$0.00
901743	\$19.53	\$2.80	\$0.00	\$0.00
901743	\$19.53	\$2.80	\$0.00	\$0.00
901743	\$10.37	\$0.00	\$0.00	\$0.00
901743	\$10.49	\$0.00	\$0.11	\$0.00
901743	\$19.18	\$9.90	\$0.00	\$0.00
901744	\$26.53	\$0.00	\$0.00	\$0.00
901744	\$19.18	\$11.17	\$0.00	\$0.00
901744	\$26.53	\$3.50	\$0.00	\$0.00
901745	\$12.89	\$0.00	\$0.00	\$0.00
901763	\$19.18	\$0.00	\$0.00	\$0.00
901774	\$12.89	-\$1.05	\$0.00	\$0.00
901774	\$12.89	\$0.00	\$10.08	\$0.00
901774	\$10.49	\$0.00	\$0.00	\$0.00
901774	\$7.97	\$0.00	\$0.00	\$0.00
901774	\$24.13	\$0.00	\$1.11	\$0.00
901774	\$9.11	\$0.00	\$0.00	\$0.00
901774	\$10.49	-\$0.69	\$0.00	\$0.00
901774	\$7.97	\$0.00	\$0.00	\$0.00
901774	\$12.89	\$0.00	\$0.00	\$0.00
901774	\$12.89	\$0.00	\$0.00	\$0.00
901774	\$10.49	\$0.00	\$0.00	\$0.00
901774	\$19.18	\$1.49	\$0.00	\$0.00
901774	\$19.18	\$10.53	\$0.00	\$0.00
901774	\$12.89	\$0.00	\$0.00	\$0.00
901774	\$12.89	\$0.00	\$0.00	\$0.00
901774	\$10.49	\$0.00	\$0.00	\$0.00
901774	\$10.49	-\$0.69	\$0.00	\$0.00
901775	\$15.83	\$0.00	\$0.00	\$0.00

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Charges to LifeLine Customers
5/4/99

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TN	Monthly Service Amount	OC&C Amount	Itemized Calls	DA Charges
901775	\$21.58	\$0.46	\$0.00	\$0.00
901784	\$7.30	\$0.00	\$0.00	\$0.00
901785	\$19.18	\$14.92	\$0.00	\$0.00
901785	\$19.18	\$28.31	\$0.00	\$0.71
901785	\$12.89	\$0.00	\$0.00	\$1.42
901785	\$14.78	\$0.00	\$0.00	\$0.00
901785	\$19.18	\$6.69	\$0.00	\$0.00
901786	\$10.49	\$0.00	\$0.00	\$0.00
901786	\$21.58	\$0.00	\$0.00	\$1.42
901786	\$19.18	\$4.99	\$0.00	\$0.00
901786	\$12.89	\$0.00	\$0.00	\$0.00
901789	\$19.18	\$0.00	\$0.00	\$0.00
901855	\$21.58	\$10.70	\$0.00	\$0.00
901867	\$22.42	\$10.50	\$0.00	\$0.00
901884	\$27.04	\$0.00	\$0.00	\$0.00
901935	\$33.34	\$0.00	\$0.00	\$0.00
901942	\$19.18	\$2.80	\$0.00	\$0.00
901942	\$19.18	\$9.90	\$0.00	\$0.00
901942	\$14.78	\$0.00	\$0.00	\$0.00
901946	\$19.18	\$0.00	\$0.00	\$0.00
901946	\$13.98	\$0.00	\$0.00	\$0.00
901946	\$10.49	\$0.00	\$0.00	\$0.00
901946	\$12.38	-\$1.23	\$0.00	\$0.00
901946	\$21.58	\$0.00	\$0.00	\$2.13
901946	\$26.23	\$27.11	\$0.74	\$0.00
901946	\$0.16	\$0.00	\$0.00	\$0.00
901947	\$21.58	\$0.00	\$0.00	\$0.00
901947	\$21.58	\$0.00	\$0.00	\$0.00
901947	\$21.58	\$3.50	\$0.00	\$0.00
901947	\$21.58	\$0.00	\$0.00	\$0.00
901947	\$21.58	\$0.00	\$0.74	\$0.00
901948	\$19.18	\$15.52	\$0.00	\$0.00
901948	\$12.89	\$0.00	\$0.00	\$0.00
901948	\$7.97	\$0.00	\$0.00	\$1.42
901948	\$21.28	\$8.47	\$0.00	\$0.00
Total	\$5,225.12	\$846.07	\$93.81	\$26.98

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REQUEST: To BellSouth Telecommunications Inc.'s knowledge, does any reseller in Tennessee, other than Discount Communications, resell BellSouth's Lifeline service?

RESPONSE: Not to BellSouth's knowledge.

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REQUEST: Does BellSouth Telecommunications Inc. agree that at June 6, 1995 it was providing Lifeline service to ratepayers in Tennessee?

RESPONSE: BellSouth agrees that as of June 6, 1995, BellSouth was offering Lifeline service to its end users pursuant to the terms and conditions of BellSouth's approved Lifeline tariff as it existed on that date.

REQUEST: If BellSouth Telecommunications Inc. agrees that at June 6, 1995 that it was providing Lifeline service to ratepayers in Tennessee, identify the source of any implicit subsidy that provided funds to offset the intrastate credit.

RESPONSE: BellSouth objects to this Request on the grounds that it is irrelevant and that the information sought does not appear reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, BellSouth responds that no implicit subsidy that provided funds to offset the intrastate Lifeline credit existed on June 6, 1995. To the extent that the deferred revenue account under BellSouth's Regulatory Reform Plan existed at that time, it had a negative balance and, therefore, could not possibly have provided "funds to offset the intrastate [Lifeline] credit."

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REQUEST: Please identify the source of any implicit or explicit subsidy that offsets the current intrastate Lifeline credit.

RESPONSE: No such implicit or explicit subsidy exists.

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REQUEST: Please detail "Link-Up" credits for lines sold to Discount Communications for resale (on a monthly basis) for January, 1999 through February, 2000. Please provide a narrative explaining the procedure for credits passed to the end user/Discount Communications.

RESPONSE: BellSouth objects to this Request on the grounds that it is vague and overly broad and that responding to it would be unduly burdensome. BellSouth further objects to this Request on the grounds that it is irrelevant and that the information sought does not appear reasonably calculated to lead to the discovery of admissible evidence. Between the credit BellSouth has applied to Discount Communications' bill to address Link-Up disputes and the agreement by BellSouth and Discount Communications to present the remaining Link-Up disputes to the FCC, no issues involving Link-Up remain in this docket.

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REQUEST: Did BellSouth Telecommunication Inc. represent through its actions, or tariffs at the initiation of its contract with Discount Communications that directory assistance was included in the service provided at the basic local exchange service rate?

RESPONSE: No.

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REQUEST: Please explain your answer to No. 24.

RESPONSE: The answer speaks for itself. Moreover, Discount Communications signed its resale agreements with BellSouth after the TRA had issued a final order stating that "directory assistance is a Non-Basic service under Tenn. Code Ann. §65-5-208(a)." See September 4, 1997 Order in Docket No. 96-01423 at 17.

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REQUEST: Is the directory assistance charge a consideration for use?

RESPONSE: BellSouth objects to this Request because it is vague and BellSouth does not know what the CAD is attempting to ask.

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REQUEST: If the answer to item 26 is yes, please explain why its isn't a toll charge subject to toll blocking?

RESPONSE: Please see BellSouth's Response to Item No. 26.